

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA

vs.

**NO. 2:17-CR-261(1)
JUDGE MARBLEY**

TREVOR SCOTT SANDS

GOVERNMENT'S SENTENCING MEMORANDUM

The United States submits that the probation officer has calculated the advisory guideline sentencing range in the defendant's case as being 97-121 months based on a Total Offense Level 28 and Criminal History Category III for Counts 7, 9 and 11 to be followed by 84 month sentences for counts 10 and 12 to be served consecutively. The plea agreement recommends a sentence of not less than 15 years and not more than 17 years. The probation officer has recommended a sentence of 204 months (17 years) and a 5-year term of supervised release. The government concurs with the probation officer's recommended sentence.

The analysis of the factors to be considered by the Court in determining if a sentence is sufficient but not greater than necessary to satisfy Congress' sentencing mandate, justifies a sentence of 17 years. The defendant is a 24-year-old male who participated in the armed robberies of businesses in central Ohio. The PSIR has done an excellent job of laying out the circumstances of the robberies. The harm that was done to the victims of the armed robberies cannot be undone. The only common denominator in the three robberies is the defendant. He is the individual who recruited the other two co-defendants in the last robbery.

A sentence of 204 months is adequate to reflect the seriousness of the offense, promote respect for the law and provide just punishment. Clearly, this sentence will still provide adequate deterrence to others who may consider participating in the armed robberies of businesses.

Therefore, the United States submits that a sentence of 204 months and a 5-year term of supervised release would be reasonable under the rationale of *United States v. Booker*, 543 U.S. 220 (2005) and *United States v. Gall*. This sentence will also satisfy the sentencing factors of 18 U.S.C. §3553(a).

Respectfully submitted,

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s/David J. Bosley
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Sentencing Memorandum was served this 19th day of December, 2019, electronically on: Fredrick D. Benton, Jr., attorney for defendant.

s/David J. Bosley
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Assistant United States Attorney